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Archon Firearms, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ARCHON FIREARMS, INC., a domestic
corporation,

Plaintiff,

v.

RUAG AMMOTEC GMBH, a foreign company;
RUAG HUNGARIAN AMMOTEC, INC., a
foreign company; RUAG AMMOTEC USA,
INC., a foreign company; RUAG SCHWEIZ AG,
a foreign company; RUAG HOLDING AG, a
foreign company; RUAG AMMOTEC
MAGYARORSZAGI ZRT., a foreign company;
ARSENAL FIREARMS LTD., a foreign
company; AF PRO TECH GROUP KFT, a
foreign company; ARSENAL FIREARMS USA,
LLC; DOE INDIVIDUALS I - X; and ROE
CORPORATIONS I - X, inclusive,

Defendants.

Case No. 2:20-cv-00227-GMN-NJK

**STIPULATION TO EXTEND TIME
TO FILE OPPOSITIONS
(First Request)**

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STIPULATION TO EXTEND TIME TO FILE OPPOSITIONS

Plaintiff, Archon Firearms, Inc. (“Plaintiff”), by and through its counsel of record, together with RUAG Ammotec GMBH, RUAG Hungarian Ammotec, Inc. and RUAG Holding AG (“Stipulating Defendants”), by and through their counsel of record, hereby submit this stipulation (the “Stipulation”) to extend the time for Plaintiff file oppositions to: (1) RUAG Ammotec GMBH’s Motion to Dismiss or Stay the Action and Compel Arbitration, or in the Alternative, Motion to Dismiss the Complaint for Failure to State a Claim (Fed. R. Civ. P. 12(b)(6)) [ECF No. 7 and 8]; and (2) RUAG Hungarian Ammotec, Inc. and RUAG Holding AG’s Motion to Dismiss for Lack of Personal Jurisdiction [ECF No. 10] (collectively, the “Motions”). The Motions were filed on February 13, 2020. Plaintiff’s oppositions/responses to the Motions are presently due on February 27, 2020. This Stipulation is submitted in compliance with LR IA 6-1 and 6-2.

This is the first stipulation to extend time to respond to the Motions. The reasons for the requested extension of time are set forth hereafter. First the Motions are substantial and in an effort to fully and succinctly brief the issues presented, Plaintiff requires additional time.

Second, Plaintiff’s primary counsel, Mr. DiLazzero, is appearing before the Appellate Division of the Superior Court of New Jersey today, February 27, 2020, for oral argument in an unrelated case. The preparation required for the oral argument consumed time that Mr. DiLazzero otherwise would have had available to dedicate to responding to the Motions.

Plaintiff and Stipulating Defendants stipulate to the following:

1. Plaintiff shall have an additional one week (7 days), or until March 5, 2020, to file a response to RUAG Ammotec GMBH’s Motion to Dismiss or Stay the Action and Compel Arbitration, or in the Alternative, Motion to Dismiss the Complaint for Failure to State a Claim (Fed. R. Civ. P. 12(b)(6)) [ECF No. 7 and 8].

2. Plaintiff shall also have an additional one week (7 days), or until March 5, 2020, to file a response to RUAG Hungarian Ammotec, Inc. and RUAG Holding AG’s Motion to Dismiss for Lack of Personal Jurisdiction [ECF No. 10].

1 3. Plaintiff agrees that it will not cite a pending motion for remand as grounds to
2 suspend briefing on the Motions until after the Court rules on the remand question.

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4 PREPARED AND SUBMITTED BY:

AGREED TO AND APPROVED BY:

5 By: /s/ Larson A. Welsh
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Ammotec, Inc., and RUAG Holding AG

11 IT IS SO ORDERED:

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14 Gloria M. Navarro, District Judge
15 UNITED STATES DISTRICT COURT

16 February 28, 2020
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